


MEMO ENDORSED

January 24, 2019

VIA ECF

The Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007

Application granted. In light of the revised case management plan, the February 8, 2019 conference is adjourned until April 5, 2019, at 4:15 p.m. SO ORDERED.

  
Ronnie Abrams, U.S.D.J.  
January 25, 2019

Re: *Waterfall Asset Management, LLC v. Waterfall Properties Group, LLC*  
Case No. 1:18-cv-6341-RA

Dear Judge Abrams:

Counsel for the parties jointly submit this letter-motion to seek a sixty-day extension of the remaining deadlines set forth in the Case Management Plan and Scheduling Order for this case and adjournment of the February 8, 2019 post-fact-discovery conference until after the new fact discovery close. We submit that there is good cause for the extension sought. Both parties have diligently pursued their claims and engaged in the discovery process. However, it is now clear that more time will be required to complete fact discovery in a manner that affords each side due process. The parties still need to resolve some document production disputes, conduct depositions and perhaps conduct some additional follow-up discovery. In addition, the parties have engaged, and remain engaged in settlement discussions, and believe that the additional time sought to continue those discussions and complete discovery will further the potential for an amicable resolution to this case.

There have been no prior requests for extensions of the times set forth in the Scheduling Order. The only prior request for an extension of time was Defendant's request for a 30-day extension of time to respond to the complaint, which was granted.

A proposed Revised Scheduling Order is enclosed with this letter. For the reasons set forth above, counsel respectfully request that the extension sought herein be granted.

Respectfully submitted,

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Enclosure.